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REMARKS

5 In the Office Action of December 7, 2004, the Examiner has rejected claims 1-13 under 35 USC §102(b) as being anticipated by Smith et al. The Office Action of December 7, 2004, has been carefully considered and by this response, entry of which is respectfully requested, claims 1-13 remain in the application.

10 Applicant respectfully traverses the rejection of claims 1-13 under 35 USC §102(b), for the reason that the cited art does not teach or anticipate the invention of Applicant, as claimed.

15 The Examiner has stated that "a prior art reference must either be in the field of applicant's endeavor or, if not, then be reasonably pertinent to the particular problem with which the applicant was concerned, in order to be relied upon as a basis for rejection of the claimed invention". However, the Smith et al patent cited by the Examiner is not pertinent to the particular problem with which  
20 the applicant is concerned. The focus of the Smith patent is on *maintenance and repair*, and specifically on minimizing the number of false pulls of still operative system components (see col. 2, lines 26-27). This is an entirely different focus than that of the present application, where the focus is  
25 on *storage* - storage of documents, including maintenance manuals, many of which can be quite large. Smith discloses a maintenance system to enhance maintenance and repair of equipment; whereas the subject application does not provide for maintenance and repair, but rather the *storage* of  
30 maintenance and repair documents.

In comparing the claims of Smith and the subject application, Smith must disclose all of the elements of the

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5 claimed combination, functioning in substantially the same way  
to produce substantially the same results. This does not  
occur. The claims of Smith address how to eliminate the need  
for intermediate repair facilities implemented remotely from a  
central station, maximizing accuracy and efficiency of system  
repair and maintenance operations. This problem is addressed  
in Smith because conventional BIT logic often generates  
maintenance orders for components when the components are in  
fact fully operational. The Smith system is an attempt to  
10 override BIT logic inaccuracies. No such inaccuracies are  
addressed by the present application, because the present  
application focuses on storage of information, not override of  
information. Therefore, it is respectfully submitted that  
Smith cannot possibly teach, suggest, or anticipate storage  
15 and handling of documents, since Smith instead teaches the  
maintenance of document-tracked systems.

In light of the remarks herein, it is respectfully  
suggested that none of the claims of the pending application  
are anticipated by the Smith et al patent, since the cited  
20 reference does not disclose each and every element of the  
claimed invention, arranged as in the claims. Independent  
claims 1, 2, 5, 10 and 13 address a storage system or method,  
not override of a maintenance schedule.


Claims 3, 4, 6-9, 11 and 12 depend from  
25 independent claims 2, 5, or 10, to contain all of the  
limitations found therein. By the dependency, it is submitted  
that these claims are not anticipated, taught, or rendered  
obvious by the cited document. Additionally, these claims add  
further limitations which distinguish them patentably from the  
30 cited document. Accordingly, withdrawal of the rejections of  
all of the claims of the application under 35 USC §102(b) is  
respectfully requested.

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5 In view of the foregoing remarks, the undersigned attorney respectfully submits that all of the claims of the application are clearly allowable. Therefore, Applicant's attorney respectfully requests that the Examiner's rejections be withdrawn and that a formal Notice of Allowance be issued thereon.

10 If it is believed that an interview would serve to facilitate prosecution of the present application, the Examiner is requested to contact the undersigned attorney. Should the Examiner have any questions with respect to any matter now of record, Applicants' attorney may be reached at (937) 592-8603.

15 Respectfully submitted,

20 By   
Barbara Joan Haushalter  
Registration No. 33,598

25 228 Bent Pines Court  
Bellefontaine, Ohio 43311  
(937) 592-8603  
Facsimile: (937) 592-8604  
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